



**Western  
Pacific  
Regional  
Fishery  
Management  
Council**

December 17, 2003

Mr. Daniel J. Basta  
Director  
National Marine Sanctuary Program  
1305 East West Highway  
SSMC-4  
Silver Spring, MD 20910

Dear Dan:

The Western Pacific Regional Fishery Management Council (Council) has received and reviewed the *Draft Vision, Mission, Principles, Goals, and Objectives for a proposed National Marine Sanctuary in the Northwestern Hawaiian Islands* (Version 15), dated December 15, 2003. The Council has reviewed several versions of the draft document and is encouraged by the progress made in developing specific mission, goals and policies for the proposed Northwestern Hawaiian Islands (NWHI) National Marine Sanctuary. However, the Council remains concerned that this draft document continues to omit recognition of "long-term sustainable use" as part of the over-arching goals for the proposed Sanctuary, a point which the Council has stressed at numerous Reserve Advisory Council (RAC) meetings and to the RAC's Vision, Mission, Principle, Goals, Objectives Subcommittee.

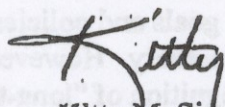
The goal of long-term sustainable use of NWHI resources was a key element in establishing the NWHI Coral Reef Ecosystem Reserve and is supported by NOAA Fisheries, the Council and the State of Hawaii. Additionally, "wise and sustainable use of the marine environment" is identified as one of the Purposes and Policies of the National Marine Sanctuaries Act. Therefore, the Council strongly recommends that a provision for wise and long-term sustainable use of NWHI resources also be recognized and included as part of the Mission and Goals of the proposed NWHI Sanctuary and the draft document.

The Council is equally concerned that this draft document includes a specific objective to prohibit certain fishing activities and existing authorizations and rights granted under Western Pacific Fishery Management Plans. This appears to be contrary to several of the Management Principles of this document, including Management Principle #7 which promotes management in a manner that incorporates best practices, available science, traditional knowledge and innovative management techniques. Such an objective also appears to be in conflict with *15 Code of Federal Regulations, §922.47 - National Marine Sanctuary Program Regulations* which does not authorize the termination of any leases, permits, licenses, or rights of subsistence use or access in existence prior to the establishment of any National Marine Sanctuary.



The Council firmly advocates the allowance for and continuation of long-term sustainable uses of NWHI resources for commercial, recreational, subsistence, cultural and religious purposes to the extent that science and research determines that those resources may be utilized without diminishing the natural character, biological or cultural integrity of the ecosystem. The Council encourages the NWHI Reserve Advisory Council and the National Marine Sanctuary Program to recognize the importance of the concept of "wise and long-term sustainable use" of NWHI resources and include a provision for such as part of the Vision, Mission, Principles, Goals and Objectives for the proposed National Marine Sanctuary in the NWHI.

Sincerely,



Kitty M. Simonds  
Executive Director

cc: Hawaii Congressional Delegation  
Admiral Conrad Lautenbacher (Ret.), NOAA Administrator  
Sam Pooley, NOAA Fisheries  
Allen Tom, NOAA/NOS  
Aulani Wilhelm, NOAA/NOS